

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

v.)

BRUCE GORDON HILL,)

Defendant.)

CRIMINAL NO. 03-10344-DPW

UNOPPOSED MOTION FOR SPEEDY TRIAL ORDER

The parties having assented to a continuance of the Status Conference in this case, the United States hereby moves for an Order under the Speedy Trial Act, 18 U.S.C. §3161, et seq., for exclusion of the interim time from the Speedy Trial calculation. Undersigned counsel notes that such time may already be excluded, by virtue of the Order and Initial Status Report, dated June 30, 2004, but makes this motion as a cautionary measure.

Undersigned counsel has conferred with counsel for Defendant Hill and is informed that there is no opposition to this motion.

With respect to the required findings to support the requested exclusion of time pursuant to 18 U.S.C. §3161(h)(8)(A), the United States submits that the ends of justice served by granting such continuance outweigh the best interests of the public and the defendant in a speedy trial. Specifically, the jury's return of a partial verdict in the trial of this case, together with the continued unavailability of co-defendant Graham Marshall, raise a variety of issues that may affect the parties' positions with respect to ongoing proceedings in this case. Allowing the requested continuance will allow the parties an opportunity to review and confer with respect to their positions.

Accordingly, the United States requests that the Court order the exclusion of time from June 6, 2005 through the date of the status conference, pursuant to Title 18, United States Code, Section 3161 (h)(8), for purposes of the Speedy Trial Act, 18 U.S.C. § 3161 et seq.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

dated: June 21, 2005

By: /s/ Paul G. Levenson
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